



July 10, 2019

Bernard J. Tyson, Chairman and CEO
1 Kaiser Place
Kaiser Permanente
Oakland, CA 94612

Re: Concerns about access to adequate mental health care for Kaiser enrollees

Dear Mr. Tyson:

The California Psychological Association issued a statement of concern in 2011 after a number of psychologists and other mental health professionals made serious allegations that the policies of Kaiser Permanente were unduly restricting the access of its members to adequate mental health services. We were deeply troubled by the allegations at that time because we knew that such a restriction would seriously compromise the care of your patients.

We write today to express our continuing concern that Kaiser may not be providing timely and adequate care to patients. We have heard from our member psychologists who are Kaiser employees, represented by the National Union of Healthcare Workers, that they continue to experience significant understaffing, quotas requiring them to see patients in numbers that allows little time to do the follow-up work often required, and imposed requirements that prevent them from delivering services that are consistent with the standard of care in the practice of psychology.

Title 28 C.C.R § 1300.67.2.2 (Timely Access to Care) requires that plans shall provide health care services in a timely manner appropriate for the nature of the enrollee's condition consistent with good professional practice. An additional requirement is that non-urgent appointments and return appointments must be provided within ten business days of a request for an appointment unless the treating provider has determined that a longer waiting time will not be detrimental to the health of the enrollee. As the professional organization for psychologists, representing the interests of approximately 20,000 licensed psychologists in California and with a mission to advocate for the mental health needs of all Californians, we believe that you may be violating these requirements.

CPA supports the ongoing objective review of Kaiser's practices by state regulators who have the responsibility for enforcing the mental health parity laws and ensuring that the lawful community standard of care is being fully observed. Given that Kaiser is a well-respected leader in integrated healthcare, with a growing number of enrollees, we urge you to consider patient safety before profit and to provide a work environment that offers the appropriate support to psychologists and other mental health professionals who are dedicated to ensuring that patients receive the care they need.

Thank you for your attention to our concerns. We are happy to discuss them with you at any time.

Sincerely,

Daniel Rockers, PhD
President

Jo Linder-Crow, PhD
Chief Executive Officer